

### **Remarks**

Applicants have reviewed the Office Action mailed May 28, 2009. Claims 1-40 are pending in the application. By this amendment, claims 1-5, 7-19, 22, 23, 30, 31, 34, 36, 38, and 40 are amended and claims 6, 20, and 21 are cancelled without prejudice or disclaimer of the subject matter therein. Upon entry of this amendment, claims 1-5, 7-19, and 22-40 will be pending. Applicants respectfully submit the following remarks.

### **CLAIM OBJECTIONS**

Applicants are grateful to the Examiner for pointing out the informalities which are now corrected by the above amendments. Accordingly, Applicants respectfully request that the claim objections be withdrawn.

### **CLAIM REJECTIONS UNDER 35 U.S.C. § 112, Second Paragraph**

Claims 16 and 18 stand rejected under 35 U.S.C. § 112, second paragraph as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention.

Applicants respectfully traverse the rejection of claims 16 and 18 based on the above amendments, which provide proper antecedent basis for the terms in claims 16 and 18. Accordingly, Applicants respectfully request that the Examiner withdraw the rejection of claims 16 and 18.

### **CLAIM REJECTIONS UNDER 35 U.S.C. § 102(e)**

Claim 20 stands rejected under 35 U.S.C. § 102(e) as being anticipated by Case (US 2005/0063418) (“Case”) published on March 24, 2005. Applicants have cancelled claim 20, without prejudice or disclaimer of the subject matter therein. Accordingly, Applicants submit the rejection is moot and respectfully request the Examiner withdraw the rejection.

### **CLAIM REJECTIONS UNDER 35 U.S.C. § 103(a)**

Claims 1 and 2 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Tabatabai et al. by (US 2003/0110297) (“Tabatabai”) and Case.

In addition: claims 3-15, 19, 22-36, and 40 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Tabatabai and Case, and further in view of Kumagai (US Patent 6,512,722) (“Kumagai”); claims 16 and 37 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Tabatabai, Case, and Kumagai, and further in view of Soundararajan (US patent 7,355,624); claims 17 and 18 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Tabatabai and Case, and further in view of Poo et al. (US 2003/0005337) (“Poo”); and, claims 38-39 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Tabatabai, Case, and Kumagai, and further in view of Poo.

Applicants respectfully traverse the rejections because the cited references do not disclose or otherwise suggest all of the limitations of the claims. In addition, Applicants respectfully submit that the Examiner has not provided any other convincing line of reasoning for a finding of obviousness in the absence of the undisclosed limitations.

To properly establish a prima facie case of obviousness, the Examiner must show that the prior art reference, or references when combined, teach or suggest all of the claim limitations.

Prior art under 35 U.S.C. §103 is the same as prior art under 35 U.S.C. §102. MPEP § 2141.01. "[T]o support the conclusion that the claimed invention is directed to obvious subject matter, either the references must expressly or impliedly suggest the claimed invention or the examiner must present a convincing line of reasoning as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of the references." *Ex parte Clapp*, 227 USPQ 972, 973 (Bd. Pat. App. & Inter. 1985).

As amended, claim 1 provides an apparatus having a) a portable storage device, and b) an interface section. Each of the portable storage device and the interface section include a connector of a first type, such that the portable storage device and the interface section can be directly connected via the connectors of the first type. In addition, the connector of the first type allows the portable storage device to directly connect to a first video system also having a connector of the first type. As amended, the portable storage device includes a number of limitations from original claims 3 and 4, including a built-in encoder-and-decoder engine, a non-volatile solid-state memory, and a built-in microcontroller.

With regard to amended claim 1, Applicants respectfully traverse the rejection because the cited references do not disclose or otherwise suggest all of the limitations of the claims. For example, neither Tabatabai nor Case disclose an apparatus with a portable storage device having a connector of a first type and an interface section having a connector of the first type, wherein the portable storage device first type connector can directly connect to a first video system first type connector and also directly connect to the interface section first type connector.

Tabatabai teaches transformation of multimedia data for playback on multiple target devices. In paragraph 51 and Figure 7, Tabatabai discloses that the transformation software 728 is stored in a storage device 726 of a computer 740. Accordingly, multimedia data received by

the computer 740 can be transformed by the transformation software 728, so that the adapted multimedia data can be utilized by multiple target devices.

Tabatabai also teaches that each of the processor 722, memory 724 and the storage device 726 (storing the transformation software 728) is coupled to a common bus 740. Even assuming, for the sake of argument, that the storage device 726 is the claimed portable storage device, Applicants respectfully submit that Tabatabai does not disclose an interface section having an interface section connector that allows direct connection to the storage device 726 via the same storage device connector that allows the storage device to directly connect to a video system.

In contrast to Tabatabai, the amended claim 1 requires the interface section – which converts video signals between different types – to have an interface section connector for connecting to the portable storage device. More importantly, the interface section connector connects to the portable storage device via the same portable storage device connector that allows the portable storage device to directly connect to the first video system.

Case discloses a media centre 43 which converts video signals between different formats. Like Tabatabai, however, Case does not disclose an interface section having any interface section connector for direct connection to a storage device via a same connector of that storage device that allows direct connection to a video system.

By providing the interface section with an interface section connector that directly connects to the portable storage device connector, embodiments of this invention allow uncoupling of the portable storage device and the interface section. Advantageously, embodiments of the invention may have a flexible structure as the interface section can be permanently coupled to a video system that is preferred for playing back video signals of a

preferred type, while the portable storage device may be carried around to record video signals of a different and less preferred type from other video systems.

In view of the above remarks, Applicants submit that the cited art does not disclose all the limitations of independent claim 1 as amended. Further, Applicants respectfully submit that the Examiner has not provided any other convincing line of reasoning for a finding of obviousness in the absence of the undisclosed limitations. Accordingly, Applicants submit that independent claim 1 is in condition for allowance. Claims 2-5 and 7-19 depend directly or indirectly from claim 1 and thus are believed to be patentable for at least the reasons presented above. Independent claim 22 and claims 23-40 depending therefrom include limitations similar to claim 1, and thus are also believed to be patentable for at least the reasons presented above. Accordingly, Applicants believe claims 1-5, 7-19, and 22-40 to be in condition for allowance and respectfully requests the rejections of the claims be withdrawn.

Claims 21 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Case in view of Kumagai. Applicants have cancelled claim 21, without prejudice or disclaimer of the subject matter therein. Accordingly, Applicants submit the rejection of claim 21 is moot and respectfully request the Examiner withdraw the rejection.

### **CONCLUSION**

Applicants submit that this application is in condition for allowance for at least the reasons presented above. Favorable consideration and prompt allowance of the application are respectfully requested. The Commissioner is authorized to charge any deficiencies and credit any overpayments to Deposit Account No. 06-1910. The Examiner is invited to telephone the undersigned if the Examiner believes it would be useful to advance prosecution.

Respectfully submitted,

/Michael J. Feller/

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Michael J. Feller  
Registration No. 59,296

Customer No. 22859  
FREDRIKSON & BYRON, P.A.  
200 South Sixth Street, Suite 4000  
Minneapolis, MN 55402-1425 USA  
Telephone: (612) 492-7000  
Facsimile: (612) 492-7077

*Please grant any extension of time necessary for entry; charge any fee due to Deposit Account No. 06-1910.*

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